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July 1, 2022

**By ECF**

The Honorable Ann M. Donnelly  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Saada v. Golan*, No. 18-CV-05292 (AMD)

Dear Judge Donnelly:

We represent Respondent Narkis Golan in the above-referenced proceeding. We write in response to the letter submitted today by Petitioner's counsel. *See* ECF 151. The position taken by Petitioner — that further briefing is unnecessary — is irreconcilable with his position before the United States Supreme Court, including in statements made to the Court one week ago in which Petitioner sought expedited remand to this court (an application Respondent consented to). Petitioner represented to that Court, "Expeditious return of the case will give the District Court **time to accept briefing from the parties** on the impact of this Court's opinion and to reach a decision before October 12, 2022, when the Italian court has scheduled a hearing in the custody proceeding." *See Golan v. Saada* (No. 20-1034) (application dated June 24, 2022).

Petitioner apparently has reversed course, now claiming that briefing is unnecessary or, in the alternative, that it should be completed in two weeks. Petitioner also has misinterpreted the Supreme Court's decision to suggest that return is appropriate; it is not. We respectfully submit that briefing is necessary to allow the parties to effectively argue how the Supreme Court's new legal framework and guidance applies to the facts and circumstances of this case, including as to this Court's prior findings. And while we share Petitioner's desire for expeditious proceedings, we believe briefing appropriately can be completed on a slightly more reasonable schedule, particularly given counsel's schedules in July. We would ask the Court to accept simultaneous opening letter briefs on July 25, and simultaneous reply letter briefs on August 5.

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We are, of course, available for a telephonic or in-person conference if the Court wishes.

Respectfully submitted,

*/s/ Karen R. King*

Karen R. King

cc: All counsel of record, via ECF